

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

PAIGE A. THOMPSON,

Defendant.

NO. CR19-159 RSL

*STIPULATED* MOTION FOR AN ORDER  
DIRECTING THE RELEASE OF  
TESTING DATA

**NOTE ON MOTION CALENDAR:  
May 25, 2022**

The parties hereby move this Court for an order directing Dr. Ken Muscatel to release to the United States and to counsel for Defendant Paige A. Thompson a copy of the testing data and results of the psychological tests he administered to Thompson on Friday, May 13, 2022. Dr. Muscatel administered the tests in accordance with the Court's March 21, 2022 order granting in part the United States' motion for a mental health examination under Federal Rule of Criminal Procedure 12.2(c) (Dkt. No. 228).

Dr. Muscatel has arranged to transmit a copy of the testing data and results of the psychological tests directly to the defense's mental health expert, Dr. Matthew Goldenberg, without the need for a Court order because doing so is consistent with the ethical principles and codes of conduct governing licensed psychologists. The transmission of the testing data and test results from Dr. Muscatel directly to Dr.

1 | Goldenberg also satisfies the United States' discovery obligations under Federal Rule of  
2 | Criminal Procedure 16(a)(1)(B) and (F).

3 |       Out of an abundance of caution, the parties seek an order directing Dr. Muscatel to  
4 | also provide to the government's prosecution team and to counsel for the defendant a  
5 | copy of the testing data and results of the psychological tests he administered as part of  
6 | the Rule 12.2(c) mental health examination of the defendant. Such an order will ensure  
7 | that Dr. Muscatel is not violating any ethical principles or codes of conduct of

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1 his profession in so doing, and that the government and the defense may fully review the  
2 results of Dr. Muscatel's mental health examination of the defendant in preparation for  
3 trial.

4 DATED: May 25, 2022.

5 Respectfully submitted,

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8 United States Attorney

9 /s/ Andrew Friedman

10 /s/ Jessica M. Manca

11 /s/ Tania M. Culbertson

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